

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA**

RACHAEL WEBSTER, LAUREN PORSCHE,
HOLLY LEDERER, SARA GATES, DONNA
NEWMAN, CHRISTINE PROKOP, LORRAINE
SNODGRASS, ALISON WHITEHEAD,
MELISSA HILL, MAUREEN MCGUINNESS,
and AMANDA CLOSE, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

LLR, INC., d/b/a LuLaRoe

Defendant.

Case No. 17-cv-225-DSC

**PLAINTIFFS' MOTION FOR LEAVE TO FILE EXHIBITS E, F, I, N, AND R TO
PLAINTIFFS' MOTION FOR CLASS CERTIFICATION UNDER SEAL AND TO
WAIVE THE FILING OF REDACTED VERSIONS OF SAID EXHIBITS**

Plaintiffs, by and through their undersigned counsel, hereby file the following Motion for Leave to File Exhibits E, F, I, N, and R to Plaintiffs' Motion for Class Certification Under Seal and to Waive the Filing of Redacted Versions of Said Exhibits and avers as follows:

1. On June 30, 2017, the Court entered the stipulated Joint Stipulated Protective Order ("Protective Order"), which governs the use and dissemination of information in this case designated by the parties as "Confidential." (*See* Doc. No. 58).

2. Pursuant to the Protective Order, a party wishing to file a document under seal that contains "Confidential" or "Confidential-Attorney's Eyes Only" information must receive leave of court in compliance with this Court's procedures.

3. Plaintiffs filed their Motion for Class Certification and need to submit to this Court, as exhibits, certain communications produced by Defendant, which documents have been designated by Defendant as "Confidential" under the Protective Order.

4. In accordance with the Protective Order and the procedures of this Court, Plaintiffs' file this motion and request permission to file Exhibits E, F, I, N, and R to Plaintiffs' Motion for Class Certification under seal. Further, the parties request that this Court waive the requirement to file redacted versions of Exhibits E, F, I, N, and R.

5. Defendant consents to this Motion.

WHEREFORE, for all of the foregoing reasons, Plaintiffs respectfully request that this Honorable Court enter an Order granting them leave to file Exhibits E, F, I, N, and R to Plaintiffs' Motion for Class Certification under seal and to waive the requirement to file redacted versions of Exhibits E, F, I, N, and R.¹

Dated: December 13, 2017

Respectfully Submitted,

By: /s/ R. Bruce Carlson

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¹ Plaintiffs previously filed a Motion for Leave to File Exhibits Under Seal, but inadvertently omitted a request to waive the requirement to file redacted versions of the exhibits. (See Doc. No. 83). The Court granted the Motion. (See Doc. No. 89)

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed with the Clerk of Court using the CM/ECF system, which will serve all counsel of record via a notification of electronic filing (NEF) on this December 13, 2017.

/s/ Kelly K. Iverson
Kelly K. Iverson